

EXHIBIT

“16”



November 4, 2019

The Honorable Judge Nathaniel M. Gorton
United States District Judge
District of Massachusetts

RE: Michelle Janavs

Your Honor,

The purpose of my letter to you is to provide my personal insight into the character of Michelle Janavs.

Michelle Janavs reported to me at Chef America during my 17-year tenure as Vice President of Foodservice Sales & Marketing. Michelle joined our marketing team soon after graduating from college and held the position of Marketing Analyst for our warehouse club business for approximately 2+ years.

Michelle had a doubly difficult task before her when she joined the Foodservice Marketing team. On one hand, this was a relatively new market segment for Chef America and customers were still somewhat apprehensive about stocking the emerging brand of HOT POCKETS®. On the other hand, she was the daughter of one of the founders and was committed to proving herself worthy of even this entry-level role.

Michelle proved that she was up to the task in every area that she was assigned. Her work ethic was second to none, often working late into the evenings researching competitive data and developing compelling sales and marketing presentations that ultimately resulted in gaining distribution in all Costco and SAM's clubs.

I believe that Michelle knew from day 1, that she would have to work harder than everyone else – and contribute better results – because of her family affiliation. She not only spent long hours at the office in Chatsworth, CA, but she traveled to every sales presentation around the US to provide on-site marketing intelligence & support to ensure a successful outcome. She was described by her sales counterparts as an indispensable member of the team.

During her tenure with Chef America, she displayed more good character, commitment, and passion for our business than anyone else on our team. She was not only a star producer, but also a shining example of the work ethic that we strived to achieve with everyone.

One of my most bittersweet lunches was with Michelle when she told me that she was leaving Chef America to start a family. Of course, I knew immediately that she would be a wonderful mother, but I was also sad to be losing such a star performer.

My letter thus far has been focused on Michelle's incredibly strong work ethic, her results-focused approach to our business, and her commitment and passion exhibited every day. Equally important in the discussion of Michelle's character, is the respect that she showed to me and every person in our company. She never once expected anything from anyone because of her last name. On the contrary, I believe that she saw her role as helping others and celebrating others' success rather than her own.

I have also had the privilege of getting to know Michelle outside of Chef America. I know that she is a loving daughter, wife & mother. When her mother [REDACTED], Michelle not only came to her aid as a caregiver, but also assumed many of her mother's personal and community obligations, and I have personally seen how she is providing the guiding light in her mother's journey to recovery. I know that this weighs heavily on Michelle's mind and conscience and her absence would be a penalty much more severe than her own personal hardship.

The Michelle Janavs that I have known for close to 30 years is not the HOT POCKETS® heiress that has been portrayed in the news media. She is someone who has personally worked very, very hard to earn her role in this world. She has been committed to using her wealth to give back to others in her community, and she is making a difference in others' lives.

I know that Michelle is remorseful for the situation that she finds herself in today. However, I also believe 100% that she has always put her children and her family first and that the actions she took to benefit her children were done with love and absolutely no malice intended to anyone. I honestly cannot believe that Michelle knew or considered the unintended consequences to others when she helped her daughters to gain college admissions. Rather, I believe that she wanted them to be fully prepared to be able to give back to future generations as is the legacy of their family.

I hope that you will consider the many years of good citizenship and her gifts of personal time & efforts as a measure of Michelle Janavs. She has made an error in judgement that is impacting others, but she is made of good moral fiber and still has much to contribute to our world.

Regards,



Robert Nelson
Vice President
Consolidated Investment Group